

Remarks

Reconsideration of the Office Action is respectfully requested.

Claims 1 to 11 are presently in the application.

The claim rejections under 35USC112 have been addressed in the accompanying claim amendments.

Applicant respectfully declines to add headings to the specification, as such are not required. See MPEP 608.01(a).

The present invention relates to a novel spring cup for retaining a lamp and to a method of manufacturing such device.

Since the exact position of a lamp filament may change from individual lamp to lamp, for certain applications it is desirable to have the ability to make adjustments in the position of the lamp, for example as to its exact position and orientation in a reflector.

In accordance with the invention, a device having such capability is provided by a spring cup having at least three spring legs which each have substantially only one degree of freedom and are arranged such that the three degrees of freedom allow displaceability of the spring cup in a displacement plane, wherein the degrees of freedom are linearly independent of each other in the displacement plane.

The claims stand rejected as being anticipated by Kohl et al. U.S. Patent No. 5, 742,114. This rejection is respectfully traversed.

Kohl does not disclose any arrangement for adjusting the position of a lamp. In the Kohl arrangement, lugs 35' or 45 are only for connecting clamp 20 to lamp cap 30, not for adjusting position. In Kohl, there are four lugs, e.g. see four welding regions 22 in clamp 20 of Figure 4 and four lugs 45 as shown in Figure 8.

Because there are four lugs displaced 90° from each other, the position of the lamp tends to remain centered and cannot be effectively adjusted. Hence, there are no degrees of freedom as are required by claim 1.

Additionally claim 1 recites that the three degrees of freedom are linearly independent of each other in the displacement plane. In Kohl, since there are two pairs of lugs, and individual lugs of each pair are directly opposite each other, any degrees of freedom (which, it appears, don't exist in the first place) are not linearly independent of each other. Thus, referring to Figure 8 of Kohl, it is seen that if there would be a degree of freedom provided by a lug, there would be another degree of freedom provided by the opposite lug, which is linearly in the same line, in other words, not linearly independent. Hence, for the above reasons the Kohl patent does not anticipate claim 1.

Moreover, it would not be obvious to modify Kohl to provide linearly independent degrees of freedom. Kohl provides four lugs because he seeks stability, not adjustability, so to modify Kohl to make the lamp position adjustable would be to defeat the intent of the patentee.

Dependent claim 3, as well as independent claim 11, add the limitation that at least one spring leg is subject to a force which in the displacement plane is directed perpendicular to the direction of the degree of freedom. Such a force is present in the Applicant's arrangement, which,

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for example, may have three springs, but not in the four lug arrangement of Kohl, where there are no such perpendicular forces (while there are two lugs situated perpendicular to any given lug, the forces of such two lugs are opposed and so cancel out, so there is no force acting perpendicularly). Thus, it is submitted that claims 3 and 11 also add patentable subject matter.

In the "prior art of record" section of the Office Action it states that Helbig et al. U.S. Patent No. 6,005,336 reads on at least claim 1. However, the Helbig reference suffers from the same defect as Kohl, in that four weld lugs 13a are provided (col. 2, line 56).

In view of the above, it is submitted that all claims in the application are allowable and a Notice of Allowance is respectfully solicited.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the U.S. Postal Service with sufficient postage as first class mail in an envelope addressed to the Commissioner for Patents P.O. Box 1450, Alexandria, Virginia 22313-1450 on October 24, 2003.

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